

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS

SHELDON G. ADELSON,)	
)	
)	
Plaintiff,)	Civil Action No.
)	
v.)	04-cv-10357-RCL
)	
MOSHE HANANEL,)	
)	
Defendant.)	
)	

[PROPOSED] ORDER ON MOTION OF HANANEL TO COMPEL

After consideration of the motion of Defendant Moshe Hananel pursuant to Fed. R. Civ. P. 37 for an Order to Compel Plaintiff Sheldon G. Adelson (“Adelson”) to make further responses to discovery requests, it is:

ORDERED:

- (1) Adelson shall produce all documents described in Document Requests Nos. 1-4, 7-11, 13-15, and 21-28, or otherwise respond to those Requests pursuant to F.R. Civ. P. 34;
- (2) Adelson shall provide full and complete answers to Interrogatories Nos. 2, 5, and 9;
- (3) Adelson shall appear for continued deposition in Boston, for ____ hours [an amount of time proportional to the further discovery ordered by the Court, but not less than one hour];

(4) Adelson shall pay Hananel his reasonable costs and expenses, including attorneys' fees, of bringing the instant motion, in an amount to be determined following submission of affidavit evidence by counsel within ten days of this Order.

Dated: _____, 2005

By the Court,

Reginald C. Lindsay
United States District Judge

I hereby certify that a true copy of the
above document was served upon the
attorney of record for each other party
by ~~mail~~ - hand on 5/19/05 - .

[Signature]